South Coast
Air Quality Management District
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Mr. Don Penman
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240 West Huntington Drive
Arcadia, CA 91007

The Shops at Santa Anita Park Draft Specific Plan Environmental Impact Report (Draft Specific Plan EIR)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph. D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC051228-06
Control Number

Localized Significance Thresholds

1. In the Draft EIR, receptors have been placed within the volume sources. Receptors and sources should not overlap. This should be corrected in the Final EIR.

2. Residential receptors are not clearly delineated in the air dispersion file. Therefore, concentrations at the residential receptors could not be readily identified. Residential receptors were not identified on the sensitive receptor map Figure 4.2-1. Residential receptors should be identified Figure 4.2-1. Residential receptors should also be identified in the documentation for the air dispersion model.

3. After reviewing the air dispersion modeling results provided by the lead agency's consultant, it is unclear which emissions were used to derive the results in Table 4.2-7. If maximum daily construction emissions were not used, the results in Table 4.2-7 may be underestimated and the conclusion regarding localized CO impacts may be incorrect. In the Final EIR, please confirm that maximum daily construction emissions were used or remodel localized impacts as necessary. Documentation of the development of the emission rates and UTM coordinates of the sensitive receptors with the maximum PM10, NOx and CO should also be included in the Final EIR.

4. In the Draft EIR, a map was not provided that included the PM10, NOx, and CO concentration isopleths and sensitive receptors. The Final EIR and future draft CEQA documents prepared by the lead agency should include a map with the PM10, NOx, and CO concentration isopleths and sensitive receptors.

Health Risk Assessment

5. In the Draft EIR, receptors have been placed within the volume sources. Receptors and sources should not overlap. This should be corrected in the Final EIR.

6. Residential receptors are not clearly delineated in the air dispersion file. Therefore, concentrations at the residential receptors could not be readily identified. Residential receptors were not identified on the sensitive receptor map Figure 4.2-1. Residential receptors should be identified Figure 4.2-1. Residential receptors should be identified in the documentation for the air dispersion model.

7. In the Draft EIR, a map was not provided that identified sensitive receptors that would be adversely affected by diesel particulates. The HRA in the Final EIR should include a map with adversely impacted sensitive receptors clearly identified.

8. Emission rates for off-road mobile sources analyzed in the HRA were estimated using on-road mobile source emission factors derived from CARB's EMFAC2002 model. On-road mobile source emission factors are not appropriate for estimating emissions from construction equipment. The off-road emissions from URBEMIS (i.e, Table 4.2-5) should be used to be consistent with the LSTs or emissions should be estimated using CARB's off-road model for appropriate fleet year, using fleet wide average emission factors. Off-road emission factors can be downloaded from the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/offroad/offroad.html. Emissions from delivery and haul track should also be included. EMFAC2002 emission factors are appropriate for delivery and haul trucks.

CO Hotspots Analysis

9. CO hotspots analyses should be completed according to the CALTRANS Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997, UCD-ITS-RR-97-21. The CO Protocol can be downloaded from the CALTRANS website at http://www.dot.ca.gov/hq/env/air/coprot.htm. Appendix B of the CO Protocol states that intersections with dedicated left turn lanes should be modeled using separate through and left turn methods as illustrated in Figure B.3 of the CO Protocol. The dedicated left-turn link endpoint should be located at the center of the adjacent turn links and extend as far back as the link representing the through movement. The through approach link volume should not include the right turn approach volume. The left-turn link endpoint is located before the intersection and does not extend to the though movement link. The Final EIR should include CALINE4 modeling with left turn links represented as prescribed by the CO Protocol.

10. A single unreferenced emission factor is used for all intersections in the Draft EIR CALINE4 model files. Emission factors should be based on approach and departure average speeds. Tables B.13 and B.14 provide average speeds for approach and departure links as a function of traffic volume, average cruise speed and percentage of red time. The emission factors should be developed using EMFAC2002 according to the CALTRANS Procedure for Using EMFAC2002, which can be downloaded from the CALTRANS website at http://www.dot.ca.gov/hq/env/air/Documents/Using_EMFAC2002_for_CO_Microscale_Modeling.pdf. The Final EIR should include CALINE4 modeling based on speed rated EMFAC2002 emission factors for average speeds for approach and departure links developed according to the CO Protocol.

11. The same intersection geometries are used for all intersections in the Draft EIR CALINE4 model files. It can be seen from Figure 3 of the Traffic Report in Appendix I of the Draft EIR that the intersections do not have the same geometries (i.e., the intersections vary in number of lanes and therefore width). Intersection geometries in the Final EIR should reflect the intersections modeled including the mixing zones as described in the CO Protocol.

Mitigation Measures for Construction Emissions

12. In order to reduce public exposure to particulate matter and other air contaminants from the project and to comply with the statewide regulation limiting diesel-fueled commercial motor vehicle idling (see California Air Resources Board website: http://www.arb.ca.gov/toxics/idling/regtext.htm), the SCAQMD staff recommends that the lead agency modify following construction mitigation measure:

    MM 4.2-2(e) The project developer shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than thirty minutes. Diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds shall be turn off when not in use for more than five minutes. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Arcadia prior to issuance of a grading permit.

13. Because construction air quality impacts remain significant after mitigation carbon monoxide CO, nitrogen oxide (NOx), particulate matter PM10, and volatile organic compounds (VOC), the SCAQMD recommends the lead agency consider implementing the following mitigation measures in addition to the measures listed in pages 4.2-23, 4.2-27 and 4.2-28 for construction to reduce applicable construction-related CO, NOx, PM10 and VOC emissions associated with the proposed project, if applicable and feasible:

    a. Configure construction parking to minimize traffic interference.
    b. Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
    c. Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
    d. Reroute construction trucks away from congested streets or sensitive receptor areas.
    e. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
    f. Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
    g. Construct/build with materials that do not require painting
    h. Use pre-painted construction materials.